

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

NEXUS PERFORATING LLC,	)	
	)	
PLAINTIFF,	)	
	)	
v.	)	
	)	
C&J ENERGY SERVICES, INC.,	)	
	)	
Defendant;	)	Civil Case No.: 4:20-cv-01539
	)	
NEXTIER OILFIELD SOLUTIONS,	)	<b>JURY TRIAL DEMANDED</b>
INC.,	)	
	)	
Defendant; and,	)	
	)	
STEVE DELOZIER,	)	
	)	
Defendant.	)	

**NEXUS PERFORATING LLC’S ANSWER TO NEXTIER OILFIELD  
SOLUTIONS INC. AND C&J ENERGY SERVICES, INC.’S COUNTERCLAIMS**

Plaintiff/Counter-defendant Nexus Perforating LLC (“Plaintiff,” “Counter-defendant,” or “Nexus”) by and through its undersigned counsel, file this Answer to Counterclaimants C&J Energy Services, Inc. and NexTier Oilfield Solutions Inc.’s (collectively “Counterclaimants” or NexTier”) Counterclaims (Dkt. No. 25).

**THE PARTIES**

1. Nexus is without knowledge or information sufficient to form a belief about the truth of paragraph 1, and therefore denies the same.
2. Admit.

**JURISDICTION AND VENUE**

3. Admit.
4. Admit.
5. Admit.

**FACTUAL BACKGROUND**

6. Paragraph 6 contains no allegation of fact requiring a response.
7. Admit.
8. Deny.
9. Deny.

**FIRST COUNTERCLAIM: DECLARATORY JUDGMENT OF NON-  
INFRINGEMENT OF U.S. PATENT NO. 10,352,136**

10. Paragraph 10 contains no allegation of fact requiring a response.
11. Deny.
12. Deny.
13. Deny.

**SECOND COUNTERCLAIM: DECLARATORY JUDGMENT OF INVALIDITY  
OF U.S. PATENT NO. 10,352,136**

14. Paragraph 14 contains no allegation of fact requiring a response.
15. Deny.
16. Deny.
17. Deny.

**JURY DEMAND**

No response is required as to Counterclaimants' jury demand.

**PRAYER FOR RELIEF**

Nexus denies that Counterclaimants are entitled to judgment in its favor or to any relief requested in its Prayer for Relief.

WHEREFORE, PREMISES CONSIDERED, Nexus prays the Court will, upon a final hearing, deny Counterclaimants' requests for Declaratory Judgment and instead, enter a declaratory judgment ruling in favor of Nexus and awarding Nexus reasonable and necessary attorney's fees, costs of court and all general and equitable relief to which the Court deems just and proper.

Date: September 8, 2020

Respectfully submitted,

BUCHE & ASSOCIATES, P.C.

/s/ John K. Buche

John K. Buche (TX Bar No. 24012352)

Scott Compton (TX Bar No. 24032088)

Byron Ma (*Pro Hac Vice* Forthcoming)

*ATTORNEYS FOR PLAINTIFF  
NEXUS PERFORATING LLC*

**CERTIFICATE OF SERVICE**

Pursuant to Local Rule CV-5(a)(3), I hereby certify that all counsel of record who are deemed to have consent to electronic service are being served on September 8, 2020 with a copy of this document via the Court's CM/ECF system.

/s/ John K. Buche  
John K. Buche